

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EDWARD PITRE,

Plaintiff,

-against-

**NOTICE OF MOTION FOR
SANCTIONS, ATTORNEYS'
FEES AND COSTS**

THE CITY OF NEW YORK,
FIRE DEPARTMENT OF THE CITY
OF NEW YORK, JAN BORODO, individually,
JOHN FIORENTINO individually, and
JOSEPH M. MASTROPIETRO, individually

18 CV 5950 (DC)

Defendants.

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PLEASE TAKE NOTICE that, upon the Declaration of Desiree Alexander dated March 1, 2024, the accompanying Memorandum of Law, and annexed exhibits, and all the papers and proceedings herein, Defendants City of New York, Jan Barodo, and Joseph Mastropietro (collectively, “Defendants”)¹ will move this Court, before the Honorable Denny Chin, United States Second Circuit Judge, visiting the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, New York, 10007, on a date and time to be designated by the Court, for an order and judgment, pursuant to 28 USCS § 1927 and under the Court’s inherent powers seeking sanctions, attorneys’ fees and costs against Plaintiff himself, trial counsel and firm.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Scheduling Order dated February 14, 2024, Plaintiff’s papers in opposition to the motion are to be filed on or

¹ The claims against Defendant Fire Department of the City of New York was dismissed, on consent, with prejudice from this action at the October 11, 2023 pre-trial hearing.

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Plaintiff,

-against-

THE CITY OF NEW YORK,
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JOHN FIORENTINO individually, and
JOSEPH M. MASTROPIETRO, individually

Defendants.

**NOTICE OF DEFENDANTS' MOTION TO FOR
SANCTIONS, ATTORNEYS' FEES AND COSTS**

HON. SYLVIA O. HINDS-RADIX

*Corporation Counsel of the City of New York
Attorney for Defendants
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New York, New York 10007*

*Of Counsel: Desiree Alexander
Tel: (212) 356-3177
Matter #: 2018-064552*

Due and timely service is hereby admitted.

New York, N.Y., 2023

....., Esq.

Attorney for.....